

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC, et al.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

No. 23-cv-10766-JSR

(Consolidated with Case No. 1:23-cv-10772-JSR and Case No. 1:24-cv-04448-JSR)

GIRARD STREET INVESTMENT HOLDINGS LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

No. 23-cv-10772-JSR

(Consolidated with Case No. 1:23-cv-10766-JSR and Case No. 1:24-cv-04448-JSR)

GIRARD STREET INVESTMENT HOLDINGS LLC,

Plaintiff,

v.

PDV HOLDING, INC.,

Defendant.

No. 24-cv-04448-JSR

(Consolidated with Case No. 1:23-cv-10766-JSR and Case No. 1:23-cv-10772-JSR)

**PLAINTIFFS' CONSOLIDATED NOTICE OF MOTIONS FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs will move this Court for an order granting summary judgment to all Plaintiffs against all Defendants for the relief sought in the Amended Complaint in *G&A Strategic Investments I LLC, et al. v. Petróleos de Venezuela, S.A. et al.*, No. 23-cv-10766, and in the Consolidated Amended Complaint in *Girard Street Investment Holdings LLC v. PDV Holding, Inc.*, No. 24-cv-4448. In accordance with the schedule approved by the Court on February 27, 2025, the Plaintiffs' moving papers are due on March 19, 2025, the Defendants'

answering papers are due on April 2, 2025, the Plaintiffs' reply papers are due on April 9, 2025, and oral argument is set for April 23, 2025 at 2:00 PM at 500 Pearl Street, New York, New York.

Dated: March 3, 2025

Respectfully submitted,

/s/ Evan Glassman

Evan Glassman

STEPTOE LLP

1114 Avenue of the Americas, 35th Floor
New York, NY 10036
Tel: (212) 506-3900
Fax: (212) 506-3950
eglassman@steptoe.com

Michael J. Baratz (*pro hac vice*)
Molly Bruder Fox (*pro hac vice*)
Emma Marshak (*pro hac vice*)
STEPTOE LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
(202) 429-3000
mbaratz@steptoe.com
mbfox@steptoe.com
emarshak@steptoe.com

Mark W. Friedman
William H. Taft V
Carl Micarelli
Juan Fandiño
DEBEVOISE & PLIMPTON LLP
66 Hudson Boulevard
New York, NY 10001
(212) 909-6000
mwfriedman@debevoise.com
whtaft@debevoise.com
cmicarelli@debevoise.com
jfandino@debevoise.com

Counsel to Plaintiffs G&A Strategic Investments I LLC, G&A Strategic Investments II LLC, G&A Strategic Investments III LLC, G&A Strategic Investments IV LLC, G&A Strategic Investments V LLC, G&A Strategic Investments VI LLC, G&A Strategic Investments VII LLC, and Girard Street Investment Holdings LLC